

## ***Exhibit 2***

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION

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TRACY CAEKAERT, and  
CAMILLIA MAPLEY,

Case No.  
CV-20-52-BLG-SPW

Plaintiffs,

vs.

WATCHTOWER BIBLE AND  
TRACT SOCIETY OF  
NEW YORK, INC.,  
WATCH TOWER BIBLE AND  
TRACT SOCIETY OF  
PENNSYLVANIA, and BRUCE  
MAPLEY, SR.,

VIDEOTAPED DEPOSITION  
UPON ORAL EXAMINATION  
OF JAMES ROWLAND

Defendants.

WATCHTOWER BIBLE AND  
TRACT SOCIETY OF  
NEW YORK, INC.,

Cross Claimant,

BRUCE MAPLEY, SR.,

Cross Defendant.

ARIANE ROWLAND, and  
JAMIE SCHULZE,

Cause No.  
CV 20-59-BLG-SPW

Plaintiffs,

vs.

WATCHTOWER BIBLE AND  
TRACT SOCIETY OF  
NEW YORK, INC., and  
WATCH TOWER BIBLE AND  
TRACT SOCIETY OF  
PENNSYLVANIA,

Defendants.

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**James Rowland**

1 that I had to do. And no work to it. It was just,  
2 you know, it was a pleasure to do it.

3 Q. Would members come to you with questions  
4 about scripture or --

5 A. Yeah.

6 Q. "Yes"?

7 A. Yeah, they started, and --

8 Q. What kind of things would they seek your  
9 help with?

10 A. Well, they could -- I've had questions on  
11 some minor problems.

12 Q. Like what?

13 A. Just, like, "My oldest son is somewhat  
14 rebellious, he's getting rebellious. I'd like for  
15 you to talk to him." And we had a number of those.

16 And the other ones are, like, "I'm going  
17 to be going out in the field service, and I'd like  
18 help, if you'd come out with me and we'd go door to  
19 door." So that kind of stuff.

20 Q. Okay. When did you begin hearing about  
21 girls being sexually abused in Hardin?

22 A. It was in -- I think in -- to the best of  
23 my recollection, in the later seventies.

24 Q. Okay, in the seventies.

25 A. Yeah. Because I was appointed as an elder 65

**James Rowland**

1 in 1974 when I got back from college, University of  
2 Oklahoma. And then they do give training then,  
3 because you go to --

4 Q. Who's "they"? What do you mean?

5 A. Pardon?

6 Q. When you say, "they do give training," who  
7 gives the training?

8 A. The Society. They have a district  
9 overseer that meets with all the elders when they  
10 have this training annually. And it's the finer  
11 points of ministry, the finer points of, you know,  
12 your duties, stuff like that.

13 So in '75, I think in early -- in January,  
14 I went to that Kingdom Ministry School. And that's  
15 when that was. It took a month.

16 Q. So that training was called the Kingdom  
17 Ministry School?

18 A. Yeah.

19 Q. Approximately 1975 for you.

20 A. Yeah.

21 Q. Do you remember where that was?

22 A. Billings.

23 Q. Billings. "Yes"? Billings?

24 A. Yeah, Billings. Yes.

25 Q. Do you remember who was there?

**James Rowland**

1       A.     No.    There was about 40 elders in the  
2     group, some new ones, some old ones.   And I can't  
3     even remember who the instructor was.   He might  
4     have been from New York.

5       Q.     Okay.   Someone you hadn't seen before.

6       A.     Yeah, he was just here to teach that class  
7     and then go back to New York or whatever.

8       Q.     And in addition to the Bible, were they  
9     using other books as part of your training?

10      A.     Yeah.   Yeah, with the -- like, the  
11     teaching book, you know, like, one of the  
12     publications is to become a better teacher, you  
13     know, and --

14      Q.     Let me show you a document.   This is  
15     called "Kingdom Ministry School Course."

16      A.     Yeah.

17      Q.     And it's Bates WTPA 1 is the first page of  
18     this document.   It's the document that was given to  
19     us by WTPA, the Pennsylvania corporation.

20      A.     Yeah.

21      Q.     And you'll see there -- can you read that  
22     okay?

23      A.     Yeah.

24      Q.     It's dated October 1972?

25      A.     Uh-huh.   Yeah, that's the thing that --

**James Rowland**

1 that's the publication that was used.

2 Q. For the training as an elder?

3 A. Yeah.

4 Q. Can I go back to that cover page for a  
5 second? So "Watch Tower Bible and Tract Society of  
6 Pennsylvania, 1972," does that look like the  
7 document that maybe you saw when you were being  
8 trained in 1975?

9 A. Yeah. Yeah, it's a book about like this  
10 (indicating). It's a red -- it's -- what do they  
11 call them now? A real deep red, burgundy almost.

12 Q. And you were using your hands to describe  
13 a very big book, thick?

14 A. About like that.

15 Q. Yeah.

16 A. And that was the Kingdom Ministry School.

17 Q. How much time did you spend at that  
18 training in Billings? Do you remember?

19 A. I think it was a month. It might have  
20 been -- it might have been two weeks. But it was a  
21 number of days involved.

22 Q. Okay. So fairly extensive, then.

23 A. Yeah.

24 Q. And did you stay in Billings or did you  
25 drive back and forth?

**James Rowland**

1 A. Uh-huh.

2 Q. That was a "yes"?

3 A. Uh-huh.

4 Q. "Yes"?

5 A. Yes.

6 MR. TAYLOR: Object to the form.

7 BY MR. SHAFFER:

8 Q. And that's how -- that training in  
9 Billings and this book here, this Exhibit 2, that  
10 informed you on how to work as an elder and how to  
11 communicate with the other members of the  
12 congregation and help them; is that right?

13 A. Yes.

14 Q. And would you reference back to this book,  
15 this Exhibit No. 2, while you were working as an  
16 elder? Would you look at it from time to time?

17 A. Yeah, any of the publications, you know,  
18 to -- something specific that you don't know  
19 exactly how to handle, you go in here and under  
20 that title or that subject area, and it was very  
21 helpful.

22 Q. Okay. So just going back to kind of your  
23 evolution -- I'm going to call it your evolution as  
24 a member of the church, in 1969, you're baptized,  
25 you're a book study conductor.

**James Rowland**

1 MR. TAYLOR: Object to the form.

2 BY MR. SHAFFER:

3 Q. Who would tell the members that, "Hey, if  
4 you've got a problem, come talk to the elders"?  
5 Who would tell the members that?

6 A. Well, I think at one or the other times,  
7 every elder would say that at certain meetings.  
8 You know, "If you're having trouble with this, see  
9 such and such," you know.

10 Q. So that could just happen maybe when you  
11 were having a Bible study at someone's house?

12 A. It could. It could happen there, could  
13 happen at regular meetings, and somebody would say,  
14 "Well, who do we see about this?" And then the  
15 brother, the elder doing the talk or whatever,  
16 presentation, would say to go to this elder or that  
17 elder.

18 But towards the end of my tenure there, it  
19 started breaking down, and I started getting a lot  
20 of complaints from kids and from parents.

21 Q. Complaints about what?

22 A. Molestation.

23 Q. Molestation?

24 A. Yeah.

25 Q. Sexual molestation?



**James Rowland**

1       A.     Yeah.   And I went to Gary Baker as time  
2     went on, and I tried to enlist him to help me,  
3     because he was the only other elder other than  
4     Martin.   And he says, "I can't" -- "I can't do  
5     anything to help you, Jim."   He said, "That's my  
6     father-in-law.   I'm staying totally out of it."

7       Q.     Because a lot of these allegations were  
8     against Mr. Svensen, correct?

9       A.     Yeah.   In my opinion, his relationship  
10    with his father-in-law was secondary to carrying  
11    out Bible principles, so I didn't understand when  
12    he just walked away from me.

13      Q.     Who was responsible for communicating with  
14    Bethel at the Hardin Congregation while you were an  
15    elder?

16      A.     Martin Svensen.

17      Q.     And why was that?   Why was it Martin  
18    Svensen who was responsible for it?

19      A.     Well, he took this responsibility, I  
20    guess.

21      Q.     As the presiding overseer?

22      A.     Yeah.

23      Q.     And is the chain of command similar  
24    amongst the elders as it is in the military?   You  
25    don't go around your chain of command?   Is it

**James Rowland**

1           A.     And those copies apparently went out, and  
2     we as a body of elders never did get a copy of it  
3     to see what it was.

4           Q.     When you're saying copies went out, you're  
5     saying copies of reports of sexual abuse?

6           A.     Or anything.

7                   MR. TAYLOR:   Object to the form.

8     BY MR. SHAFFER:

9           Q.     Or anything.

10          A.     Yeah.

11          Q.     Do you have any knowledge of whether  
12     reports of sexual abuse were ever written down and  
13     handed to a circuit overseer or not?

14          A.     I don't know.   The way that things were,  
15     it was like nonexistent.   I didn't see a report,  
16     didn't hear a report, nobody called me in.   There  
17     was no investigation, so...

18          Q.     I know from your affidavit, you made  
19     face-to-face reports, right?

20          A.     Yeah.   And usually the circuit overseer,  
21     he had the agenda, and he covered certain things,  
22     and they're outlined in what he covers.   Mainly  
23     it's field service, but also problems.   He can note  
24     problems.

25          Q.     And so you remember seeing specific

**James Rowland**

1 documents from New York that outlined what the  
2 circuit overseer was to be doing or the kind of  
3 reports that that circuit overseer was to take and  
4 report back to New York, right?

5 A. Yeah.

6 MR. TAYLOR: Object to the form.

7 THE WITNESS: Yeah, it was supposed to go  
8 to the legal department, but unless you could read  
9 somebody's mind over here, I don't think -- I never  
10 knew if the reports went out or to who.

11 BY MR. SHAFFER:

12 Q. And when you're talking about a report,  
13 you're talking about your verbal reports, your  
14 face-to-face reports of sexual --

15 A. Yeah. See, my verbal report on a  
16 one-on-one with Martin, or after a while, I didn't  
17 even do that, but I'd do at least two, and give  
18 those reports and give the report at the -- with  
19 the circuit overseer. And never did know, never  
20 did see anything, never did -- no follow-up.

21 Q. Do you remember that circuit overseer's  
22 name?

23 A. Yeah, well, the first one was a substitute  
24 circuit overseer. His name was Loren -- from  
25 Laurel. He was an elder in Laurel.

**James Rowland**

1 when someone's come to you and admitted that  
2 they've done something wrong, you talked about a  
3 process. You mentioned that just coming to you as  
4 kind of the start of that process. What did you  
5 mean by that?

6 A. Well, a person that comes to me, and I've  
7 had dozens of them over the years, but usually  
8 they're sorry they did it.

9 Q. Right.

10 A. And they want to come to somebody and tell  
11 them, "I did this, and I'm sorry I did it."  
12 Sometimes it's not serious enough to go to a  
13 committee, but it's serious enough to refer to  
14 maybe one of the elders, that he's good at that,  
15 you know, he's a good listener and all that, and  
16 lives in the district.

17 Q. So if you felt like you could, you'd try  
18 to handle it on your own it sounds like.

19 A. Yeah, but I found that it's good to  
20 confide in that person and then confide also in  
21 another elder that this is happening and kind of  
22 keep on eye on things, you know, help her, help  
23 him.

24 Q. What did you understand, based on your  
25 training and your reading and your time at the

**James Rowland**

1 KM School, what did you understand about your  
2 ability to inform the police about what happened if  
3 somebody committed a crime?

4 A. Well --

5 MR. TAYLOR: Objection to the form of the  
6 question.

7 BY MR. SHAFFER:

8 Q. Go ahead.

9 A. My orientation of those years in the  
10 military and those years in the boarding school,  
11 there's a hierarchy involved. And the one that I  
12 came to know as a Christian was that it goes into  
13 the congregation oversight to the presiding officer  
14 and is discussed.

15 And that discussion, if it's serious  
16 enough, that would be brought out to the circuit  
17 overseer, and it says right in there that this will  
18 be reported even by the congregation to the legal  
19 desk in New York.

20 Q. Yeah. So you understood that was the  
21 process.

22 A. That was it.

23 Q. That's who you reported to. That's who  
24 the congregation would report to if there was a  
25 serious issue, even maybe a crime, you'd report it

**James Rowland**

1 to the circuit overseer and then New York?

2 MR. TAYLOR: Objection to the form.

3 THE WITNESS: Well, report it to the PO  
4 first, the presiding overseer. And then if the  
5 circuit -- if they hold onto that problem, when the  
6 circuit overseer comes around and it's reported to  
7 him, and he'll get ahold of the legal desk.

8 But if there's no circuit overseer coming  
9 around for the next three months, that presiding  
10 overseer files a report immediately to the legal  
11 department. That's what it says.

12 BY MR. SHAFFER:

13 Q. Yeah, right. And you understood based on  
14 your training that was the process, that's how  
15 things are reported, correct?

16 A. Yeah.

17 MR. TAYLOR: Object again to the form.

18 BY MR. SHAFFER:

19 Q. During your time as an elder and all your  
20 training, did you ever see any instruction in any  
21 of these documents and any of the books that you  
22 looked at, any of the guidance you used, did you  
23 ever see any instruction on when to take something  
24 to the police?

25 A. I didn't think about it. Because in my

**James Rowland**

1 secular job, I'd taken those kinds to the police.  
2 And then in a Christian congregation, I depended  
3 totally on it.

4 Q. What do you mean?

5 A. Give it to the presiding overseer if it's  
6 serious. "That girl over there reported, and it  
7 looks like it's sexual." He then gets ahold of the  
8 legal department in New York. That's the way it  
9 went.

10 Q. I understand. So in your secular job, in  
11 your secular life, it seems like there was a  
12 distinction in whether you could go to the police  
13 or not between your secular duties as a public  
14 administration official versus your duties as an  
15 elder. Is that fair?

16 A. Yeah.

17 Q. Yeah.

18 A. And if I didn't believe that -- if I  
19 didn't believe that this Jehovah's organization was  
20 run by Christian principles in the Bible, you know,  
21 I wouldn't have been maybe so inclined not to go  
22 outside of that reporting procedure. But it was my  
23 thought as an elder and as a member of the  
24 congregation that there's a process that handles  
25 it.

**James Rowland**

1 Q. And you trusted that process.

2 A. I stuck with the process. I didn't want  
3 to -- I didn't want to become identified as an  
4 apostate or as a bad guy or whatever, because that  
5 would stumble people. I wanted to follow the  
6 process that the organization had, period.

7 Q. And do you believe you did that?

8 A. Yes.

9 Q. So let's go back again. I want to talk a  
10 little bit more about the process of you've got  
11 somebody who's done something wrong, and they come  
12 to you. Let's just say it's stealing an apple from  
13 the market, like you've described.

14 When is there recovery or that person's  
15 repentance, or however you want to characterize  
16 that process? When is it complete?

17 A. It will take time. Sometimes it will take  
18 weeks. But you become enjoined with that person  
19 being a helper. If it's a young man that's  
20 wavering, you become a friend with them.

21 Q. Okay.

22 A. And more than -- make it a point to be  
23 with them sometimes and talk about the good things  
24 and so he knows he's got someone on his side.

25 Q. It sounds like you're building a



**James Rowland**

1 taking your kids to this home. Do you remember the  
2 last name of the family?

3 A. Haines.

4 Q. Okay. You were taking your girls to the  
5 Haines home.

6 A. (Nods.)

7 Q. I understand.

8 A. See, we didn't know that kind of stuff was  
9 going on in there.

10 Q. I see.

11 And the young woman who came to you and  
12 reported that Gunner was touching her  
13 inappropriately, did she live in that home?

14 A. Yeah, she was the one that seen that.  
15 She's the one that seen that thing going on in the  
16 living room.

17 Q. And what did she tell you she saw?

18 A. She seen him having his mouth between her  
19 legs.

20 Q. Okay. And were you an elder at that  
21 point?

22 A. Yes.

23 Q. So I imagine, based on your training and  
24 documents you'd been provided as an elder, that's  
25 something you knew you needed to take to the

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**James Rowland**

1     presiding overseer?

2           A.     Absolutely.

3           Q.     And you did that.

4           A.     Absolutely.

5           Q.     That was Mr. Svensen you took it to?

6           A.     Yes -- no, he brought it up himself at a  
7     meeting.

8           Q.     Okay.

9           A.     He said there was an incident down at the  
10    Haines house with the Mapley girl. And he said,  
11    "It wasn't really nothing." He said, "I looked  
12    into it. All he did is when he was sitting down,  
13    he accidentally hit her leg with his hand." That  
14    was it.

15          Q.     I see.

16          A.     And I knew that it was different.

17          Q.     No judicial committee was formed --

18          A.     Nothing.

19          Q.     -- based on that report? Okay. Okay.

20          A.     Yeah.

21          Q.     All right. Thank you.

22                 I do want to go through all the times you  
23    were informed about sexual abuse and sexual  
24    mistreatment and the reports you made. But would  
25    you mind finishing going through this document in

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**James Rowland**

1 front of you for a moment?

2 A. Oh, no problem.

3 Q. Thank you, sir.

4 Can you flip to page 114. This section is  
5 called "Safeguarding the Cleanness of the  
6 Congregation." And I think you testified a little  
7 bit earlier that as an elder, you had kind of two  
8 main duties: overseeing the preaching and keeping  
9 the congregation clean.

10 A. Uh-huh, right.

11 Q. And so this, what we're looking at here,  
12 this section, this would be -- again, this section  
13 of Exhibit 2, would this correspond to the training  
14 you got as an elder on how to keep the congregation  
15 clean?

16 A. Yes.

17 Q. If we look on the left-hand side there, it  
18 talks about "Hearings Before The Judicial  
19 Committee."

20 A. Uh-huh.

21 Q. Is that essentially how you were directed  
22 by New York, at least, to handle --

23 MR. TAYLOR: Object to the form.

24 BY MR. SHAFFER:

25 Q. -- that would handle matters that would

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**James Rowland**

1 need to go before the judicial committee if we look  
2 at that section? That's how you -- you knew you  
3 needed to look at this section of this manual if  
4 there was going to be a judicial committee; is that  
5 right?

6 A. Right.

7 Q. Now, let's go to the right-hand column  
8 there. I've highlighted, "Must be two or three  
9 eyewitnesses, not just persons repeating what they  
10 have heard; no action can be taken if only one  
11 witness." Do you see that?

12 A. Uh-huh.

13 Q. What did that mean or what does that mean  
14 as an elder?

15 A. Well, it would be different if there were  
16 just one person coming forward, but at that time, I  
17 had already -- I had already heard some things by  
18 other members in the congregation.

19 Q. Well, let's step back. Let's just talk in  
20 general.

21 Is this what's understood and known as the  
22 kind of two or three witness rule?

23 A. Yeah.

24 Q. Right?

25 A. And the way I interpreted it from my

**James Rowland**

1 any difference. Your tires are all flat.

2 Q. Right. It doesn't mean it didn't happen.

3 A. Yeah.

4 Q. All right. Let's go to page 116. And

5 I've highlighted a section there, it says,

6 "Handling Cases That Require Public Reproof."

7 What's "public reproof"?

8 A. That's where the congregation is put on  
9 notice that something happened and it involved this  
10 person. So it's like guarding the cleanliness of  
11 the congregation.

12 Like if somebody had weed and was going  
13 to -- and you watch that person and notify the  
14 young people, you know, "Be careful of this guy."

15 Q. Okay. I've highlighted another section  
16 down there. It says, "Announcement made that  
17 person named has engaged in 'conduct unbecoming a  
18 Christian.'" And then it says, "Do not mention  
19 specific sin, to avoid possible legal  
20 difficulties."

21 Do you see that?

22 A. Uh-huh.

23 Q. So based on that, it looks like you were  
24 trained by the church as an elder that if you  
25 determined that someone had done something

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**James Rowland**

1 requiring reproof, you would just say, "This person  
2 engaged in conduct unbecoming to a Christian"?

3 A. Right.

4 Q. And you wouldn't necessarily say the  
5 specific sin, right?

6 A. You wouldn't say, "I just seen him smoking  
7 pot out there by the Kingdom Hall." You'd rather  
8 just say, "Unbecoming of Christian behavior."

9 Q. And same if it was sexual abuse, right?  
10 You wouldn't say that so-and-so sexually abused a  
11 girl. You would say, "That person engaged in  
12 conduct unbecoming a Christian," right?

13 A. Uh-huh.

14 Q. And that's what you were trained to do.

15 A. Yeah, if it got investigated and it was in  
16 fact happening.

17 Q. Yes. And in that situation, the rest of  
18 the congregation wouldn't be told necessarily that  
19 there was a person within their midst who was  
20 sexually abusing girls, would it?

21 A. Uh-uh.

22 Q. That was a "no"? You shook your head  
23 "no," but I wanted to make sure that was a "no."

24 A. No.

25 Q. Thank you.

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**James Rowland**

1 somebody, even though it was just that one person,  
2 no investigation.

3 You have to do something. They can just  
4 say, "Oh, you're lying," or "Well, maybe you'll  
5 have a better day next day," or "Maybe he won't  
6 throw you down anymore and stick his tongue in  
7 you."

8 You've got to investigate it, and because  
9 it's written right there.

10 Q. Yeah.

11 A. Otherwise, it wouldn't be in there. If it  
12 was me, I would have taken it right to the legal  
13 department and got a determination. Otherwise, you  
14 wind up like this, getting sued.

15 Q. Would you have gone to the police if you  
16 felt like you could have?

17 A. I would have went outside of the  
18 organization. But, see, I believed totally in the  
19 footsteps of Jesus Christ. And on the one hand, I  
20 didn't want to drag Jehovah's name in, because I  
21 knew there was a process for handling this.

22 Q. The process in this book here, Exhibit 2?

23 A. Yeah.

24 Q. Yeah.

25 A. And secondly, I knew that if I did, and

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**James Rowland**

1 pedophiles.

2 But what used to -- what really got me and  
3 still gets to me this day is that when we come  
4 together as a body of elders, and something  
5 serious -- and I don't know if you're going to ask  
6 me how the circuit overseers treated me. I'll tell  
7 you.

8 I said in one, the first meeting,  
9 Brother Polakowski, I said, "There's something  
10 serious going on with Martin." I said, "We've got  
11 to talk about it as a body of elders." He jumped  
12 up, and I thought he was going to hit me. Come  
13 running across. He said, "Don't you ever say  
14 anything about Martin Svensen again. Got it?"

15 And that was the end of any hearing, or --  
16 I don't know if they sent those papers to  
17 the incident to New York. That was none of my  
18 business, I guess.

19 And the other one, Brother --

20 Q. Let's go back. The one where the circuit  
21 overseer came and said, "Don't ever talk about  
22 Martin Svensen again" --

23 A. Yeah.

24 Q. -- and jumped -- you talked about that in  
25 your affidavit, right?

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**James Rowland**

1           A.     Yeah.

2           Q.     Do you remember what you told,  
3 specifically what you told that circuit overseer?

4           A.     I couldn't say nothing. He just said,  
5 "And that's it."

6           Q.     Tell me what you told him, if you can  
7 remember.

8           A.     I just said, "We've got to do something in  
9 this congregation. There are bad things happening  
10 to the kids, and it involves one of the elders,  
11 Martin Svensen."

12                   That's when he jumped up, came over, "If  
13 you ever say anything more about Martin Svensen in  
14 this matter," and shut me up right there.

15                   And he was a circuit overseer.

16           Q.     Right.

17           A.     He was a substitute in Laurel, if he's  
18 still alive.

19           Q.     Okay.

20           A.     The same thing happened with  
21 Brother Milneck. He's the one that said, "If you  
22 do anything wrong, I'm going to be like a millstone  
23 around your neck when they throw you in the water."

24           Q.     What did that mean?

25           A.     Don't ever cross him up.

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**James Rowland**

1 Q. Did you tell Brother Milneck the same  
2 thing you told the other visiting overseer?

3 A. Yeah. He was sitting there --

4 Q. Where were you?

5 A. In a circuit overseer's visit with the  
6 elders in Hardin.

7 Q. Were you in the Kingdom Hall, or --

8 A. Kingdom Hall. And I said, "There's  
9 something going on, Brother Milneck." I said, "And  
10 it can't go on much longer." I said, "There's  
11 pedophilia in this congregation, rampant, and it  
12 involves Martin Svensen."

13 He jumped up and come right over to me  
14 like he was going to hit me. And I told my friend  
15 later, I said, "Good thing he didn't hit me. I'd  
16 have put all four of them on the floor." I'm a  
17 kung fu man.

18 And I wouldn't have done that, because I  
19 was very peaceful after coming into the truth, and  
20 somebody could come and hit me, and I wouldn't  
21 break their neck, you know, so...

22 Q. When you brought this to the attention of  
23 the circuit overseers, as you've described in your  
24 affidavit -- and first, let me just show you your  
25 affidavit. Can you look at paragraph 4?

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**James Rowland**

1 I'm going to hand you another, this is a  
2 thicker one. It's basically a photocopy of a book.  
3 And the cover's going to be the --

4 A. The organization book.

5 Q. -- "Organization for Kingdom-Preaching and  
6 Disciple-Making."

7 A. Yeah, that was a book we often referred  
8 to.

9 Q. Okay. Let me hand this to you then. So  
10 this is -- first of all, this is  
11 Caekaert/Mapley 2834, all the way through 3027.  
12 And it's titled "The Organization for  
13 Kingdom-Preaching and Disciple-Making."

14 I'll hand this to you, Mr. Rowland. Let  
15 me know if you've ever seen a copy of that book  
16 before.

17 A. Oh, yeah.

18 Q. Did you see it at the Kingdom Hall in  
19 Hardin?

20 A. Yes. You'd find one in every book bag, I  
21 think, in the organization of brothers.

22 Q. It was in every book bag?

23 A. Yeah, it was referred to many times.

24 Q. What would you refer to this book for?

25 A. For actually improving your ministry and 168

**James Rowland**

1     how you fit into the organization and the stream of  
2     responsibilities.

3           Q.     Stream of responsibilities between  
4     New York and the local congregation, or between  
5     elders and ministerial servants? What do you mean?

6           A.     Usually the organization is the one that  
7     you're in. When you talk about the organization,  
8     nobody talks about New York.

9           Q.     Okay. Just the local congregation.

10          A.     Yeah, local congregation.

11          Q.     Let's mark this as 3.

12          A.     That's the organization.

13                     (Deposition Exhibit No. 3 was marked for  
14     identification.)

15     BY MR. SHAFFER:

16          Q.     Is this book here that's been marked as  
17     Exhibit 3, is this something that you would refer  
18     to as an elder pretty consistently?

19          A.     Yeah, either teaching in the congregation  
20     or making sure you're helping people to understand  
21     the ministry and how to do it, you know.

22          Q.     Would you consider it an important book in  
23     helping you do your job as an elder?

24          A.     Yeah.

25          Q.     Okay.